

# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

ADESSO Homeowners' Association, *as*  
*controlled by the Owners since April 23,*  
2013, ADESSO Horizontal Property  
Regime, William Durkin and Sam Vause,  
Jr., individually and on behalf all others  
similarly situated and Emad Tadros, M.D.  
of the Grace Living Trust as owner of all  
retail units,

Plaintiffs,

vs.

Holder Properties, Inc.;  
ADESSO/Columbia, LLC; Drake/Adesso,  
LLC; Holder Adesso, LLC; JRH Adesso,  
LLC; JRH, LLC; John R. Holder,  
Individually; ADESSO Homeowners  
Association *as controlled by the*  
*Developers prior to April 23, 2013*; Niles  
Bolton Associates, Inc.; Browder +  
LeGuizamon and Associates, Inc.; Hussey,  
Gay, Bell & DeYoung, Inc., Consulting  
Engineers; Jordan & Skala Engineers, Inc.;  
Key Construction, Inc.; Ace Glass  
Company, Inc.; Advanced Door Systems,  
Inc.; All-South Electrical Constructors,  
Inc.; Aquarian Pools of Columbia, Inc.;  
Artistic Enterprises, Inc.; Fernandez  
Contractors International, Inc. d/b/a  
Benzach, Inc.; Commercial Building  
Services, Inc.; Capitol City Custom Iron  
Works & Fence, LLC; Flooring Services,  
Inc.; Gill Plumbing Company; Guardian  
Fence Suppliers of SC, Inc.; Hester  
Drywall, Inc.; Holland Roofing, Inc.; SDI  
Solutions, LLC d/b/a I-Sys Corporation;  
Jamco Doors; JR Hobbs Co.; Loveless  
Commercial Contracting, Inc.; Reliance  
Interiors, Inc.; Southern Fireproofing  
Company, Inc.; Southern Vistas, Inc.; SRS  
Concrete Finishing; Stafford Consulting

Case No.

Engineers, Inc.; Taylor Brothers )  
Construction Company, Inc.; Winston Steel )  
LLC d/b/a Winston Steel & Stair Co.; )  
Andersen Windows, Inc.; and Carlisle )  
Construction Materials Incorporated, )  
 )  
Defendants. )

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**AFFIDAVIT**

NOW COMES the affiant, John R. Holder, and, having been duly sworn, deposes and says as follows:

1. I am over eighteen years of age and fully competent to make this Affidavit. I do so based upon my personal knowledge of the facts stated herein.

2. I am neither a minor nor under any disability that would prohibit me from testifying as to the matters set forth herein.

3. I reside in the State of Georgia.

4. I am the sole member of JRH, LLC, which is the manager of JRH Adesso, LLC. JRH Adesso, LLC is the manager of Holder Adesso, LLC, which manages Drake/Adesso, LLC, and which in turn manages Adesso Columbia, LLC.

5. Adesso Columbia, LLC developed Adesso, a luxury condominium complex located at 601 Main Street, Columbia, South Carolina.

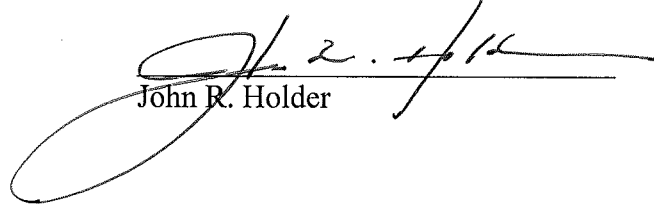
6. The Adesso consists of one hundred ten (110) residential condominium units and approximately 8,500 square feet of retail space.

7. The hard cost for construction of the Adesso was approximately \$29,300,000.00.

8. By December 2012, Adesso Columbia had sold all residential condominium units. The average sales price of each residential condominium unit located at the Adesso was approximately \$261,194.


9. No more than seventy-two (72) of the residential condominium units at the Adesso are owned by South Carolina citizens.

Further, Affiant sayeth not.

  
John R. Holder

SUBSCRIBED AND SWORN TO BEFORE ME this

the 2 day of March, 2016.

  
Notary Public in the State of Georgia  
My Commission Expires: Jan 19, 2021